



Illinois Department of Natural Resources

One Natural Resources Way Springfield, Illinois 62702-1271
<http://dnr.state.il.us>

Pat Quinn, Governor
Marc Miller, Director

June 9, 2014

Greg Dolbeare
Sny Island Merchandising Company
Post Office Box 517
Louisiana, Missouri 63353

RE: SIMCO Grain Elevator and Barge Loading facility
Project Number(s): 1408212 (USACE Public Notice P-2862)
County: Pike

Dear Mr. Dolbeare:

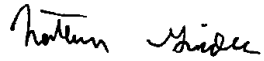
This letter is in reference to the above mentioned U.S. Army Corps of Engineers (USACE) Public Notice dated February 7, 2014. The project is located along the left descending bank of the Mississippi River in Pike County at Section 13, Township 7S, Range 6W. The project involves the construction of six (6) 200,000 bushel grain silos and related infrastructure, as well as a conveyor belt to the river and floating barge system with associated support structures and mooring dolphins.

The Department provided comments previously on February 14, 2014 and concurred with the need to conduct a mussel survey in the project area. SIMCO contracted with Ecological Specialists, Inc. (ESI) who conducted the mussel survey on April 10 and 11, 2014. The mussel survey report dated May, 2014 indicated likely presence of the state-threatened butterfly mussel (*Ellipsaria lineolata*) in the footprint of the proposed support pier for the conveyor belt. Two (2) live individuals were found during the survey. A total of 18 species of mussels were found in the project area with density generally decreasing with distance from the bank. The site may qualify for the Illinois Natural Areas Inventory (INAI) list given the number of mussel species found representing a high quality mussel bed. The information has been forwarded to the department's INAI program manager.

The Department understands SIMCO has elected to move the barge loader further from the bank to mitigate impacts to the mussel bed and achieve more depth for loading barges. The Department commends you for these efforts. However, construction of the support pier is likely to result in "take" of the state-threatened butterfly mussel as defined under the *Illinois Endangered Species Protection Act* [520 ILCS 10/11]. The Department agrees with ESI's finding that mussels may need to be relocated out of the footprint of the support pier. The Department recommends SIMCO pursue Incidental Take Authorization (ITA) for the state-threatened butterfly mussel from the Department's Office of Resource Conservation and relocate mussels out of harm's way immediately prior to construction of the support pier. Please contact Jenny Skufca (jenny.skufca@illinois.gov) for all matters pertaining to ITA.

Please contact me at 217-524-0501 if you have questions regarding this review.

Sincerely

A handwritten signature in black ink, appearing to read "Nathan Grider". The signature is fluid and cursive, with the first name "Nathan" being more prominent than the last name "Grider".

Nathan Grider
Biologist
Impact Assessment, OREP

cc: IDNR, Butch Atwood
IDNR, Dean Corgiat
IDNR, Jenny Skufca
USACE, Charles Frerker
USFWS, Matt Mangan